1	DANIEL G. BOGDEN				
2	United States Attorney PHILLIP N. SMITH, JR.				
3	Assistant United States Attorney Lloyd D. George United States Courtho	ouse			
4	333 Las Vegas Blvd. South, Suite 5000 Las Vegas, Nevada 89101				
5	(702) 388-6336				
6	UNITED STATES DISTRICT COURT				
7	DISTRICT OF NEVADA				
8	* * *				
9					
10	UNITED STATES OF AMERICA,)	2:15-cr-017-JAD-VCF		
11	Plaintiff,)			
12	v.)			
13	,,)			

RAYCHELLE IVORY,

Defendant.

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Defendant RAYCHELLE IVORY, that the date for the Government to file a response to the Defendant's Motion to Suppress Evidence (Docket #37) be extended for seven (7) days.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on May 1, 2015. PACER set the Government's Response deadline for May 18, 2015. Due to the press of business, Government counsel needs additional time to research the issues presented in the Defendant's Motion and to draft an appropriate response.

1	2. The Defendant is in	carcerated, but he does not object to the continuance of the				
2	Government's response deadline.					
3	3. The additional time requested herein is not sought for purposes of delay, bu					
4	merely to allow the Government enough time to research and draft an appropriate response.					
5	4. Additionally, denial	of this request for continuance could result in a miscarriage				
6	of justice.					
7	5. This is the first stip	5. This is the first stipulation filed herein to continue the Government's response				
8	deadline.					
9	DATED: May 14, 2015.					
10						
11	PHILLIP N. SMITH, JR.	 MONIQUE KIRTLEY				
12	Assistant United States Attorney Counsel for the United States	Assistant Federal Public Defender Counsel for Defendant RAYCHELLE IVORY				
13	Counsel for the Office States	Counsel for Defendant RATCHEELE IVOR I				
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) 2:15-cr-017-JAD-VC	CF
Plaintiff,)	
v.)	
RAYCHELLE IVORY,)	
Defendant.)	
)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 1. The Defendant's Motion was filed and served on May 1, 2015. PACER set the Government's Response deadline for May 18, 2015. Due to the press of business, Government counsel needs additional time to research the issues presented in the Defendant's Motion and to draft an appropriate response.
- 2. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.
- 3. The additional time requested herein is not sought for purposes of delay, but merely to allow the Government enough time to research and draft an appropriate response.
- 4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 5. This is the first stipulation filed herein to continue the Government's response deadline.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the motion response deadline.

CONCLUSIONS OF LAW

The additional time requested herein is not sought for purposes of delay, but merely to allow the parties sufficient time to receive and review additional evidence, and to allow the Government adequate time to prepare a response to the Defendant's Motion to Suppress, taking into account due diligence. The failure to grant said continuance would likely result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for the Government to respond to the Defendant's Motion to Suppress (Docket #37) is extended until May 18, 2015.

Contact

UNITED STATES MAGISTRATE JUDGE